

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**LINDSEY KENT SPRINGER,
OSCAR AMOS STILLEY,**

Defendants.

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Case No. 09-CR-043-SPF

**UNITED STATES' RESPONSE IN OPPOSITION TO DEFENDANT SPRINGER
MOTION FILED NOVEMBER 1, 2008, DOC. NO. 224, AND MOTION TO SEAL
DOCUMENTS INAPPROPRIATELY PUBLISHED BY DEFENDANT SPRINGER**

The United States of America, by and through its attorneys, Thomas Scott Woodward, Acting United States Attorney for the Northern District of Oklahoma, and Kenneth P. Snoke, Assistant United States Attorney, and Charles A. O'Reilly, Special Assistant United States Attorney, hereby opposes Defendant Springer's motion, Doc. No. 224, and moves to seal the following attachments: grand jury testimony transcript cover pages (Doc. No. 224-2); sealed plea agreement(Doc. No. 224-3); Government Motion for Sentencing Relief (Doc. No. 224-4). The documents in Doc. Nos. 224-2, 224-3 and 224-4 were provided to Defendants pursuant to the United States' discovery obligations. Doc. Nos. 224-3 and 224-4 were unsealed only for the limited purpose of discovery.

On November 1, 2009, one week into trial, Defendant Springer filed this twenty-page motion, along with more than one hundred pages of attachments, apparently seeking to relitigate

his pretrial motions to dismiss and seeking a mistrial. The United States does not intend to rehash the issues Defendant Springer attempts to relitigate at this late date, but stands ready to supplement its opposition to Defendant Springer's motion should the Court require additional briefing.

The United States further requests that the Court take whatever additional steps it feels is warranted for Defendant Springer's violations of secrecy with respect to the grand jury transcript and sealed documents. This is not the first instance of Defendant Springer filing documents that were inappropriately not sealed.

Respectfully submitted,

THOMAS SCOTT WOODWARD
ACTING UNITED STATES ATTORNEY

/s/ Charles A. O'Reilly
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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of November 2009, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Lindsey Kent Springer
Defendant

Oscar Amos Stilley
Defendant

Robert Williams
Standby Counsel assigned to Lindsey Kent Springer

Charles Robert Burton, IV
Standby Counsel assigned to Oscar Amos Stilley.

/s/ Charles A. O'Reilly
Special Assistant U.S. Attorney